

**UNITED STATES BANKRUPTCY COURT
FOR THE MIDDLE DISTRICT OF PENNSYLVANIA**

In Re:

Salvatore & Jane Tolomello

Debtor(s)

Chapter: 13
Case Number: 5-15-01033

CERTIFICATE OF MAILING

The undersigned employee in the office of:

Tullio DeLuca, Esquire

hereby certifies that a copy of the attached Notice of Debtor's Motion to Approve
Private Sale of Real and Personal Property Free and Clear of All Liens,
Charges & Encumbrances was mailed today to all parties named on the mailing
list attached hereto by regular first class mail.

DATED: August 19, 2016

SIGNED: Lena Henly

TITLE: Secretary

IN THE UNITED STATES BANKRUPTCY COURT
FOR THE MIDDLE DISTRICT OF PENNSYLVANIA

IN RE: : CHAPTER 13

SALVATORE TOLOMELLO :
d/b/a Sal's Handyman Services :
d/b/a Villa Venico and :
JANE R. TOLOMELLO :
a/k/a Jane Ruth Tolomelo :
a/k/a Jane Tolomello :
d/b/a The Snoopy Fox Consignment Shop :

Debtor(s) : CASE NO. 5:15-01033

SALVATORE TOLOMELLO :
d/b/a Sal's Handyman Services :
d/b/a Villa Venico and :
JANE R. TOLOMELLO :
a/k/a Jane Ruth Tolomelo :
a/k/a Jane Tolomello :
d/b/a The Snoopy Fox Consignment Shop :
Movant :

vs.

BANK OF AMERICA HOME LOANS, :
LUZERNE COUNTY TAX CLAIM BUREAU, :
NORTHEAST REVENUE SERVICE, HOLLY :
DAUBERT, TAX COLLECTOR, INTERNAL :
REVENUE SERVICE, PA DEPARTMENT OF :
REVENUE, :
and CHARLES J. DEHART, III, ESQUIRE :
Respondents :

NOTICE OF DEBTOR'S MOTION TO APPROVE PRIVATE SALE OF REAL AND
PERSONAL PROPERTY FREE AND CLEAR OF ALL LIENS, CHARGES AND
ENCUMBRANCES

NOTICE IS HEREBY GIVEN THAT:

Debtors, Salvatore and Jane Tolomello, reside at 21 Fairground Rd., Dallas, PA 18612
and seeks leave to sell real property of the above captioned case located at 21 Fairground Rd.,
Dallas, PA 18612, along with personal property and fixtures to Jonica and Amanda Jovanov, for
the sum of One Hundred Thirty Eight Thousand (\$138,000.00) Dollars. The sale is to be free and

clear of all liens, charges and encumbrances, with all valid liens and encumbrances to be paid at time of closing.

The Debtors further request the Court to allow distribution of the proceeds from the sale of real and personal property as follows:

- a. Any out-of-pocket expenses advanced by Tullio DeLuca, Esquire in connection with the sale of the aforementioned property, and which have not been reimbursed at the time of settlement along with an attorney fee of \$1,426.00;
- b. Any Notarization and/or incidental recording fees associated with the sale of the above property;
- c. Realtors Commission of 6 % percent;
- d. Any transfer tax which is the responsibility of the seller herein;
- e. Any unpaid real estate taxes and other municipal claims/liens arising from property;
- f. Payment to the holder of the first mortgage lien, Bank of America Home Loans
- g. That any other unpaid liens shall attach to the remaining sale proceeds;
- h. Debtor's exemption if any;
- i. The net sale proceeds in an amount to pay the balance owed to the Chapter 13 Trustee, if any, from the above sale shall be paid to Charles J. DeHart, III, Esq., Chapter 13 Trustee, for distribution to creditors in accordance with the Debtor's confirmed Plan;

The Sale is not subject to higher and better offers.

Any inquiries regarding the sale and/or to request for copies of the motion or a time and date to examine the property prior to the sale, can be made directly to Debtor's Counsel, Tullio DeLuca, Esquire.

Hearing on any Answers or Objections will be heard on September 15, 2016 at 9:30 a.m. at the United States Bankruptcy Court, Courtroom No. 2, 197 South Main Street, Wilkes-Barre, PA 18701. If no objection and request for hearing are timely filed with the Bankruptcy Clerk, 197 South Main Street, Wilkes-Barre, PA 18701 to the sale of the aforementioned real and personal property on the above terms and conditions on or before **September 5, 2016**, the Court may grant the relief requested. If you desire to contest this matter, file a written objection in the form of responsive pleading and request a hearing with a copy to Tullio DeLuca, Esquire at the address below: Any filing must conform to the Rule of Bankruptcy Procedures unless the Court determines otherwise.

Date of Notice: 8/19/16

Tullio DeLuca, Esquire
381 N 9th Street
Scranton, PA 18504
(570) 347-7764

Aspen National Collection
PO Box 10689
Brooksville, FL 34603-0689

Bank of America, N.A.
2380 Performance Dr.
Richardson, TX 75082-4333

Bank of America
PO Box 982238
El Paso, TX 79998-2238

Bank of America Home Loans
Attn: Customer Service
Ca6-919-01-41
P.O. Box 5170
Simi Valley, CA 93062

Bank of America, N.A.
Bankruptcy Department
PO Box 26012, NC4-105-02-99
Greensboro, North Carolina 27420-6012

**Bank of America, N.A., its assignees
and/or
c/o Prober & Raphael**
20750 Ventura Boulevard, Suite 100
Woodland Hills, CA 91364-6207

Berkheimer Tax Administrator
P.O. Box 25144
Lehigh Valley, PA 18002-5144

CACH, LLC
4340 S. Monaco St., 2nd Fl.
Denver, CO 80237

Capital One NA
c/o Becket & Lee LLP
POB 3001
Malvern, PA 19355-0701

Chase
P.O. Box 15298
Wilmington, DE 19850

City of Wilkes-Barre
Sewer Maintenance Fee
P.O. Box 1324
Wilkes-Barre, PA 18703-1324

Wilkes-Barre Recycling Fee
P.O. Box 1324
Wilkes-Barre, PA 18703-1324

City of Wilkes-Barre
Tax Office, Room 10
40 E. Market St.
Wilkes-Barre, PA 18711

Client Services, Inc.
3451 Harry S. Truman Blvd.
St. Charles, MO 63301

Vacation Village at Parkway
2949 Arabian Nights Blvd.
Kissimmee, FL 34747

Joshua I Goldman
KML Law Group, PC
701 Market st. Suite 5000
Philadelphia, PA 19106-1541

Internal Revenue Service
Special Procedures Branch
P.O. Box 7346
Philadelphia, PA 19101-7346

Kohl's
P.O. Box 3043
Milwaukee, WI 53201-3043

Luzerne County Tax Claim Bureau
c/o Northeast Revenue Service
200 N. River St.
Wilkes-Barre, PA 18711

Nicole Holton
297 Carey Ave.
Wilkes-Barre, PA 18702

Norris Rogers
299 Carey Ave.
Wilkes-Barre, PA 18702

Wyoming Valley Sanitary Authority
P.O. Box 33A
1000 Wilkes-Barre Street
Wilkes-Barre, PA 18703